



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

October 6, 2005

Certified Mail No. 7000 0520 0016 0850 3908

Frank Bennett, President
Bennett Lumber Products, Inc.
P.O. Box 49
Princeton, ID 83857

RE: Facility ID No. 057-00008, Bennett Lumber Products, Inc., Princeton
Final Permit Letter

Dear Mr. Bennett:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050206 for Bennett Lumber Products, Inc., in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application submittals received on June 3, 2005, June 29, 2005, and September 17, 2005. This permit is effective immediately. This permit does not release Bennett Lumber Products, Inc., from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Lewiston Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Dan Pitman at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin Bauer".

Martin Bauer, Administrator
Air Quality Division

MB/DM/sd
Enclosures

Permit No. P-050206



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-050206

FACILITY ID No.: 057-00008

AQCR: 62

CLASS: A

SIC: 2421

ZONE: 11

UTM COORDINATE (km): 517.3, 5195.8

1. PERMITTEE

Bennett Lumber Products, Inc.

2. PROJECT

Permit to Construct for Lumber Drying Kiln No. 7 (Double-Track Kiln)

3. MAILING ADDRESS

P.O. Box 49

CITY

Princeton

STATE

ID

ZIP

83857

4. FACILITY CONTACT

Jeff Abbott

TITLE

Plant Engineer

TELEPHONE

(208) 875-1121

5. RESPONSIBLE OFFICIAL

Frank Bennett

TITLE

President

TELEPHONE

(208) 875-1121

6. EXACT PLANT LOCATION

3 miles east of the town of Princeton, on State Highway 6

COUNTY

Latah

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Sawmill – dimensional lumber

8. PERMIT AUTHORITY

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.


TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: October 6, 2005

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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
lb/yr	pounds per year (any consecutive 12-month period)
mbf	thousand board feet of lumber
PM	particulate matter
PM₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
TAPs	toxic air pollutants
T/yr	tons per year
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER P-050206

Permittee:	Bennett Lumber Products, Inc.	Facility ID No.: 057-00008	Date Issued:	October 6, 2005
Location:	Princeton, Idaho			

1. PERMIT SCOPE

Purpose

- 1.1 The purpose of this permit to construct (PTC) is to authorize the construction of Drying Kiln No. 7.
- 1.2 This PTC does not supercede any PTC or Tier II permits, and does not change the facility's status as a Title V major source. The facility lumber throughput of all kilns is limited to the potential throughput that existed prior to issuance of this PTC. As a result, annual potential emissions of criteria air pollutants and TAPs are not increased by this PTC.

Regulated Sources

- 1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	<u>Drying Kiln No. 7 (new)</u> Manufacturer: Wellons Length: 73 feet Design: Double-track	Uncontrolled
2	<u>Drying Kiln Nos. 1, 2, 3, 4, 5, and 6 (existing)</u> <u>Drying Kiln Nos. 1, 4, 5 and 6</u> Manufacturer: Lumber Systems Length: 73 feet Design: Double-track <u>Drying Kiln No. 2</u> Manufacturer: Moore Length: 73 feet Design: Double-track <u>Drying Kiln No. 3</u> Manufacturer: Lumber Systems Length: 73 feet Design: Single-track	Uncontrolled

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2. LUMBER DRYING KILN NO. 7**2.1 Process Description**

Green lumber of various wood species processed by the existing sawmill is stacked inside of Drying Kiln No. 7. Indirect heat is applied to the lumber to reduce the moisture content to the desired level. The dried lumber is then planed, sawed, and trimmed in the existing sawmill to final product specifications.

2.2 Emission Control Description

The emissions from the kiln are uncontrolled.

Emission Limits**2.3 Opacity Limit**

Emissions from the drying kilns, or any other stack, vent, or functionally equivalent opening associated with the drying kilns, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625, unless otherwise specified.

2.4 TAPs Emission Limits**2.4.1 Formaldehyde**

The combined emissions of Formaldehyde from Kilns No. 1 through 7 shall not exceed a total of 400 pounds per any consecutive 12-month period (lb/yr).

2.4.2 Acetaldehyde

The combined emissions of Acetaldehyde from Kilns No. 1 through 7 shall not exceed a total of 760 pounds per any consecutive 12-month period (lb/yr).

2.5 PM₁₀ and VOC Emission Limits

Emissions of PM₁₀ and volatile organic compound (VOC) shall not exceed the corresponding limits listed in Table 2.1.

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Table 2.1 CRITERIA AIR POLLUTANT EMISSION RATE LIMITS

Emissions Limits^a –Annual (T/yr)^b		
Source Description	PM₁₀^c	VOCs^d
	T/yr	T/yr
Combined emissions of Lumber Drying Kilns Nos. 1, 2, 3, 4, 5, 6, and 7	9.2	72.9

^a Compliance determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

^b Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c Particulate matter with a mean aerodynamic diameter of 10 microns or less

^d Volatile organic compounds

Operating Requirements**2.6 Throughput Limits – Existing Kilns No. 1 through 6 and Kiln No. 7**

The throughput through the kilns shall not exceed 97.2 million board feet per any consecutive 12-month period. This throughput limit shall be applied to existing kilns No. 1 through No. 6 and new kiln No. 7.

Monitoring and Recordkeeping Requirements**2.7 Throughput Monitoring Requirement**

Each month, the permittee shall monitor and record the throughput of the Lumber Drying Kilns No. 1 through No. 7 for that month and for the most recent 12-month period. A compilation of the most recent two years of records shall be kept on site and shall be made available to DEQ representatives upon request.

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3. EMISSION RATE LIMITS SUMMARIES

Table 3.1 provides the TAPs emission rate limits for the sources in this permit.

Table 3.1 TAPs EMISSION RATE LIMITS

Emissions Limits ^a –Annual (lb/yr) ^b		
Source Description	Acetaldehyde	Formaldehyde
	lb/yr	lb/yr
Combined emissions from Lumber Drying Kilns Nos. 1, 2, 3, 4, 5, 6, and 7	760	400

^a Compliance determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

^b Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

Table 3.2 provides the criteria air pollutant emission rate limits for the sources in this permit.

Table 3.2 CRITERIA AIR POLLUTANT EMISSION RATE LIMITS

Emissions Limits ^a –Annual (T/yr) ^b		
Source Description	PM ₁₀ ^c	VOCs ^d
	T/yr	T/yr
Combined emissions from Lumber Drying Kilns Nos. 1, 2, 3, 4, 5, 6, and 7	9.2	72.9

^a Compliance determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

^b Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c Particulate matter with a mean aerodynamic diameter of 10 microns or less

^d Volatile organic compounds

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4. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.